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14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
18 INSURANCE COMPANY, ALLSTATE
19 INDEMNITY COMPANY, and ALLSTATE
20 FIRE & CASUALTY INSURANCE
21 COMPANY,

CASE NO. 2:15-cv-2265-MMD-DJA

22 Plaintiffs,
23 v.
24 MARJORIE BELSKY, MD; MARIO
25 TARQUINO, MD; MARJORIE BELSKY,
MD, INC., doing business as INTEGRATED
PAIN SPECIALISTS; and MARIO
TARQUINO, MD, INC., DOES 1-100, and
ROES 101-200,

26 Defendants.

27 AND RELATED CLAIMS

[SECOND REQUEST]

1 Plaintiffs and Counterdefendants, ALLSTATE INSURANCE COMPANY, ALLSTATE
 2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
 3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (hereinafter "Allstate Parties"),
 4 and Defendants and Counterclaimants MARJORIE BELSKY, M.D., MARIO TARQUINO, M.D.,
 5 MARJORIE BELSKY, M.D., INC. d/b/a INTEGRATED PAIN SPECIALISTS, and MARIO
 6 TARQUINO, M.D., INC. (hereinafter "Belsky Parties"), by and through their respective attorneys of
 7 record, stipulate and agree to extend the March 31, 2023, deadline for dispositive motions established
 8 in the February 24, 2023 order of this Court [ECF No. 510], extending the deadline for dispositive
 9 motions to April 14, 2023.

10 1. The extension is due to work load issues and scheduling conflicts for respective
 11 counsel for the Allstate Parties (Todd W. Baxter) and the Belsky Parties (Samuel R. Mirkovich), and
 12 in light of the critical importance of the Belsky Parties' motion as to Allstate's claims herein and the
 13 Allstate Parties' motion on the Belsky Parties' counterclaims, an extension of time is necessary to
 14 complete work on the motions.

15 2. Counsel for Allstate Parties, Mr. Baxter, has been preparing two oppositions to
 16 extensive motions for summary judgment filed by the defendants in the case of *Allstate v. Shah* Case
 17 No. 2:15-cv-01786-APG-DJA, with the first opposition being filed on March 9, 2023 and the second
 18 opposition being filed on March 14, 2023. The due dates on these oppositions was extended in part
 19 due to an illness impacting Mr. Baxter. Mr. Baxter also has an appellate brief due on March 29, 2023,
 20 and another due on April 6, 2023 in the state Court of Appeal in Fresno, California.

21 3. There are a number of issues and claimants involved in this case, with extensive
 22 discovery having been completed that must be summarized for purposes of the motions to be filed.
 23 The motions at issue are of critical importance; however, due to the existing work schedule of counsel
 24 for the parties, including, but not limited to, substantial appellate briefing in other matters and briefing
 25 on summary judgment for Allstate parties in a separate case, in order to ensure that the parties have a
 26 full and adequate opportunity to prepare the motions, good cause exists to extend the dispositive
 27 motion deadline to April 14, 2023.

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1 4. Although counsel for the Allstate Parties and the Belsky Parties have been diligently
2 working on the motions, additional time is needed due to unanticipated work-related issues and
3 scheduling conflicts.

4 5. The parties stipulate and agree to extend the deadline for dispositive motions from
5 March 31, 2023 to April 14, 2023.

6 6. This stipulation is made in good faith and not to delay the proceedings.

7 Trial has not been scheduled in this matter.

8 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

9 DATED this 28th day of March, 2023

10 FAIN ANDERSON VANDERHOEF
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13 By: /s/ Todd W. Baxter

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10 DATED this 28th day of March, 2023

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21 IT IS SO ORDERED.

22 DATED: March 28, 2023



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UNITED STATES DISTRICT JUDGE